

ISMAIL J. RAMSEY (CABN 189820)  
United States Attorney  
PAMELA T. JOHANN (CABN 145558)  
Chief, Civil Division  
ELIZABETH D. KURLAN (CABN 255869)  
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055  
San Francisco, California 94102-3495  
Telephone: (415) 436-7298  
Facsimile: (415) 436-6748  
Elizabeth.Kurlan@usdoj.gov

Attorneys for Defendants

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

KHALID ALSHFI,

Plaintiff,

v.

UNITED STATES OF AMERICA, *et al.*,

Defendants.

Case No. 4:24-cv-03908 DMR

**SECOND STIPULATION TO EXTENSION OF  
TIME FOR DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT; ORDER**

On November 26, 2024, the Court granted the parties' stipulation for Defendants' motion for summary judgment, setting the due date by December 30, 2024. *See* Dkt.17. Following the Court's order, the parties conferred and stipulate to a further extension of Defendants' motion for summary judgment. The parties make this request because Defendants need additional time to prepare and finalize their motion for summary judgment and the supporting documents that will be submitted with their motion. For these reasons, and as articulated below in the Declaration of Counsel, the parties respectfully request that the Court grant their stipulation.

1 Dated: December 30, 2024

Respectfully submitted,<sup>1</sup>

2 ISMAIL J. RAMSEY  
3 United States Attorney

4 /s/ Elizabeth D. Kurlan  
5 ELIZABETH D. KURLAN  
6 Assistant United States Attorney  
7 Attorneys for Defendants

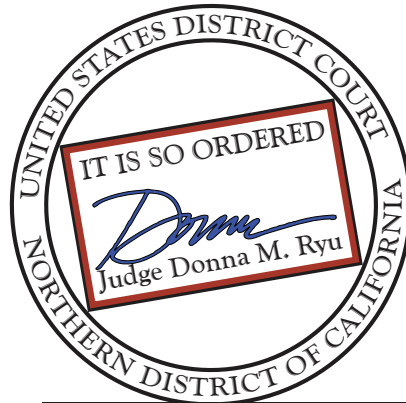
8 Dated: December 30, 2024

9 /s/ Ghassan J. Shamieh  
10 GHASSAN J. SHAMIEH  
11 Attorney for Plaintiff

12 **ORDER**

13 Pursuant to stipulation, IT IS SO ORDERED. Defendants will file their motion for summary  
14 judgment by January 17, 2025.

15 Date: January 2, 2025



16 DONNA M. RYU  
17 United States Chief Magistrate Judge  
18  
19  
20  
21  
22  
23  
24  
25  
26

27 <sup>1</sup> In accordance with Civil Local Rule 5-1(i)(3), the filer of this document attests that all  
28 signatories listed herein concur in the filing of this document.

**DECLARATION OF ELIZABETH D. KURLAN**

I, Elizabeth D. Kurlan, declare and state as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Northern District of California and counsel of record for the federal Defendants in the above-captioned action.

2. On November 26, 2024, the Court granted the parties' stipulation for Defendants' motion for summary judgment. *See* Dkt. No. 17. Although I diligently have been working on Defendants' motion for summary judgment, I cannot complete it by the current due date because the agency has determined that they will need a brief period of additional time to finalize the supporting documents that will be submitted with Defendants' motion.

3. On December 19, 2024, I contacted Plaintiff regarding Defendants' request for a brief extension of time to prepare their motion for summary judgment, and Plaintiff consented to the request.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: December 19, 2024

/s/ Elizabeth D. Kurlan

ELIZABETH D. KURLAN

Assistant United States Attorney